

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

V.

CAN. 04-1350(GMS)

DR. SYLVIA FOSTER, ET AL.



MOTION FOR INTERROGATORY
ANSWERS # 4

DATE : 1/11/07

Jimmie Lewis
SBI #506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

- 1.) DURING THE 6 1/2 MONTHS AFTER DEC 1, 03 WHEN THE SUPERIOR COURT GRANTED THE MOTION TO EVALUATE THE PLAINTIFF, COULD THE PLAINTIFF HAVE STABILIZED FROM THE DILEMMA'S THAT GAVE REASON FOR THE SUPERIOR COURT ORDERING THE EVALUATION THAT WAS CONDUCTED BETWEEN THE DATES OF 5/21/04 AND 6/25/04. AT THE D.P.C.
- 2.) DR. FOSTER WERE YOU IN YOUR CORRECT STATE OF MIND DURING THE PLAINTIFF'S STAY AT THE D.P.C DATING FROM 5/21/04 TO 6/25/04.
- 3.) ~~SWA~~ IS IT OKAY TO HOLD SOMEONE DOWN WITH FORCE AND GIVE THEM PSYCHOTROPIC DRUGS, WHEN THERE IS NO SIGN OF MOOD DISORDER.
- 4.) IS IT OKAY TO HOLD SOMEONE DOWN WITH FORCE AND GIVE THEM PSYCHOTROPIC DRUGS, WHEN THERE IS NO SIGN OF PSYCHOSIS.
- 5.) AT THE D.P.C ON 6/6/04 WHO WAS THE PERSON OR PERSONS WHO'S SAFETY WAS PUT IN JEOPARDY BY THE PLAINTIFF, WHO WITNESSED THE ALLEGED INCIDENTS; DESCRIBE THE SAID INCIDENT(S).

6.) AT THE D.P.C ON 6/14/04 AT OR ABOUT 8:00 PM, WHO WAS THE PERSON OR PERSONS WHO'S SAFETY WAS PUT IN JEOPARDY BY THE PLAINTIFF, WHO WITNESSED THE ALLEGED INCIDENT, AND DESCRIBE THE SAID INCIDENT IN DETAIL.

7.) AT THE D.P.C ON 6/14/04 AT OR ~~ABOUT~~ ABOUT 11:00 PM, WHO WAS THE PERSON OR PERSONS WHO'S SAFETY WAS PUT IN JEOPARDY BY THE PLAINTIFF, WHO WITNESSED THE ALLEGED INCIDENTS, AND DESCRIBE THE SAID INCIDENT IN DETAIL.

8.) AT THE D.P.C ON 6/21/04 WHO WAS THE PERSON OR PERSONS WHO'S SAFETY WAS PUT IN ~~THE~~ JEOPARDY BY THE PLAINTIFF, WHO WITNESSED THE ALLEGED INCIDENTS, AND DESCRIBE THE INCIDENT IN DETAIL.

9.) AT THE D.P.C ON 6/22/04 WHO WAS THE PERSON OR PERSONS WHO'S SAFETY WAS PUT IN JEOPARDY BY THE PLAINTIFF, WHO WITNESSED THE ALLEGED INCIDENT, AND DESCRIBE THE INCIDENT IN DETAIL.

10.) THE D.P.C. MASTER TREATMENT PLAN DOCUMENTS A PLAN AND A TARGET DATE, BUT THE PLAINTIFF WAS RETURNED TO THE D.O.C. BEFORE 7/2/04 TARGET DATE, WHY

11.) DR. FOSTER, WHAT WERE THE CONDITIONS LIKE IN THE CELL HE WAS CONFINED IN, (CELL # 197 H.R.Y.C.I. INFIRMARY), 30 DAYS PRIOR TO HIS BEING TRANSFERRED TO THE D.P.C.?
NOTE: THIS QUESTION IS RELEVANT TO WHY THE PLAINTIFF WAS SICK UPON HIS ARRIVING AT THE D.P.C.

12.) WHAT ARE THE REASONS WHY THE PLAINTIFF WAS (4) POINT RESTRAINED, EACH TIME HE WAS (4) POINT RESTRAINED. PROVIDE SPECIFIC DETAILS.

13.) WHAT DATE(S) DID THE PLAINTIFF RECEIVE THERAPY FROM THE TEAM PSYCHOLOGIST FOR THE PSYCHOLOGICAL DILEMMAS HE REPORTED RECEIVING FROM GRAY, MOFFETT, SAGERS AND EVANS ON 6/14/04 AT OR ABOUT 8:00 PM.

14.) DOES A HYPERDERMIC NEEDLE UTILIZED TO INJECT PSYCHOTROPIC DRUGS BREAK THE SKIN IN A WAY THAT BLOOD MAY EXIT THE AREA THAT THE HYPERDERMIC NEEDLE ENTERED THE SKIN.

15.) DO PSYCHOTROPIC DRUGS KILL BRAIN CELLS.

16.) CAN AN ALLERGIC REACTION TO PSYCHOTROPIC DRUGS KILL

17.) WHAT DATE(S) WAS THE PLAINTIFF CHECK BY A PHYSICIAN, FOR THE INJURIES HE REPORTED RECEIVING FROM GRAY, SAGERS, MOFFETT AND EVANS ON 6/14/04 AT OR ABOUT 8:00 PM.

18.) IS AGGITATION A VALID REASON TO INJECT A PERSON WITH PSYCHOTROPIC DRUGS.

19.) IF A PSYCHIATRIST, WHO IS AUTHORIZED TO CONDUCT A FORENSIC EVALUATION ON A PATIENT, EXCLUSIVELY UTILIZES REPORTS WRITTEN BY MENTAL HEALTH PERSONS OTHER THAN THE AUTHORIZED PSYCHIATRIST, CAN THE PSYCHIATRIST RELY ON SAID REPORTS AS IF THE PSYCHIATRIST WROTE SAID REPORTS.

20.) WHY WAS THE CHEF SALAD ORDERED FOR THE PLAINTIFF.

21.) WHY WAS THE CHEF SALAD ORDERED FOR THE PLAINTIFF DISCONTINUED.

22.) WAS JAMES FLOYD ORDERED A TOSS SALAD, IF YES WHAT DATE.
~~WHEN~~.

23.) WAS JAME FLOYD ORDERED A CHEF SALAD, IF YES WHAT DATE.

24.) WHO IS RESPONSIBLE FOR THE PLAINTIFF NOT RECEIVING A COMPETENCY HEARING BEFORE BEING TRANSFERED BACK TO THE D.O.C

25.) ~~WHEN~~ HOW LONG HAS THE NO SHAVING HEAD WITH RAZORS BEEN IN EFFECT, PRODUCE THE RULE STATING THIS.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DOE HEREBY CERTIFY ON THIS 11TH DAY OF
JAN, 2007, THAT I DID MAIL ONE TRUE
AND CORRECT COPY OF THE MOTION FOR INTERROGATORY
ANSWERS # 4, BY U.S. POSTAL TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DELAWARE 19801

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